



*Consulting Engineers  
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October 13, 2008  
(PBW Project No. 1432)

VIA OVERNIGHT COURIER

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-AP)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: September 2008 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport,  
Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
    - Subtask 6.5 – Validation of groundwater analyses performed in August for samples from Zone C monitoring well NE4MW32C and piezometers NG3CPT1, NE4CPT2, NC2CPT3, and OCPT4 was completed. Water levels were measured in these wells/piezometers on September 29. Re-development of well NE4MW32C was performed to address potential concerns of surface water inflow during the Hurricane Ike storm surge. A groundwater sample was collected from well NE4MW32C on September 30.
    - Subtask 6.9 – A draft Nature and Extent Data Report (NEDR) is currently being prepared.

- Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan - data analysis, human health risk evaluation and ecological risk evaluation were partially completed.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
- Field measurements collected during groundwater sampling are provided in Attachment A.
  - Water levels measured in Site monitoring wells and calculated water level elevations are provided in Attachment B.
  - Validation reports for the groundwater analyses described above are provided in electronic form on the enclosed DVD.
  - The updated database, including all data validated through September 30, 2008, is provided in electronic format on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
- RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
    - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through Cone Penetrometer Testing (CPT) piezometer installation, groundwater sample collection, sample analyses, data validation, and data evaluation.
    - Subtask 6.9 – Preliminary Site Characterization Report – to be continued through Draft NEDR preparation.
  - Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan – to be continued through data analysis, human health risk evaluation and ecological risk evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 75% complete. As a result of Hurricane Ike, which made landfall in the region on September 13, 2008, the sampling of well NE4MW32C, originally scheduled for September 16, 2008, was delayed until September 30, 2008.

Although not formally required by the UAO, several activities were performed at the Site in response to the effects of Hurricane Ike. These activities included the following:

- An initial post-hurricane Site inspection was performed on September 16, 2008. A summary of the observations during this inspection and photographs from the inspection were provided to you via e-mail on September 16.

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- A follow-up Site inspection was performed on September 17, 2008. The observations during this inspection were discussed with you via telephone on September 17. A follow-up summary with photographs was sent to you via e-mail on September 18.
- During the September 17, 2008 site inspection, a soil sample was collected adjacent to damaged electrical transformers on a power pole that had been knocked over by the hurricane. This soil sample was analyzed for polychlorinated biphenyls (PCBs) and none were detected. The laboratory report for these analyses is provided on the enclosed DVD. A plan for management of the transformers was provided to you via e-mail on September 22, 2008.
- Investigation-derived waste (IDW) drums, including drums that had been impacted and/or relocated by the storm surge were collected and their contents consolidated into a storage tank (water) and roll-off bin (soil) during the period from September 22 through 24. The emptied IDW drums were crushed and contained in a separate roll-off bin. Also on September 24, the damaged transformers were removed from the fallen power pole, wrapped in plastic and transferred to a pad area east of the tank farm area. It is anticipated that the transformers could be removed in conjunction with the removal of the other tanks from the tank farm area.
- A Site inspection was conducted by you on September 30, 2008.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Rob Rouse - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLC

**ATTACHMENT A**  
**GROUNDWATER SAMPLING FIELD MEASUREMENTS**

Groundwater Field Parameters - September 2008 Sampling Event  
Gulfco Marine Maintenance Facility

Monitoring Well ID	Measurement Date	Parameter	Result	Unit
NE4MW32C	9/30/2008	conductivity	37280	umhos/cm
		pH	7.46	
		temperature	27.1	Celcius

**ATTACHMENT B**  
**WATER LEVEL MEASUREMENTS**

### September 2008 Water Level Measurements

Well ID	Date	Time	MP <sup>1</sup> Elevation (ft AMSL <sup>2</sup> )	Depth to Water (ft BMP <sup>3</sup> )	Water Elevation (ft AMSL)
NE4MW32C	9/29/2008	1419	6.31	7.48	-1.17
NG3CPT1	9/29/2008	1347	5.79	6.09	-0.30
NE4CPT2	9/29/2008	1354	6.77	9.88	-3.11
NC2CPT3	9/29/2008	1412	5.36	11.29	-5.93
OCPT4	9/29/2008	1402	6.38	12.97	-6.59

Notes:

<sup>1</sup> MP = Measurement Point (Top of PVC well casing).

<sup>2</sup> AMSL = Above Mean Sea Level (NGVD 29).

<sup>3</sup> BMP = Below Measurement Point.